

Ryan Allen Glidewell
GDC # 1001320166 / J2-136T
Calhoun State Prison
P.O. Box 249
Morgan, La 39866

Nov. 8th, 2016

1:16-cv-371

FILED
ASHEVILLE, N.C.

NOV 14 2016

U.S. DISTRICT COURT
W. DIST. OF N.C.

Att: US District Court of North Carolina;

I wish to file a complaint against North Carolina, Buncombe County Department of Social Services, and Toni Alleyne DSS social worker. This is pertaining to juvenile case no.: 15JT391, 392, (In the matter of H.A.J., and E.R.G. minor children)

I also wish to file ^(request) immediately a injunction ^(temporary) ordering the juvenile court, Judge Dotson-Smith to stay all proceeding and procedures to terminate my parental rights and to place my minor children up for adoption. For the Court has erred and allowed misfeasance, malfeasance, manifest misguided discretion, and blatant abuse of authority and has placed minor children in substantial risk of physical (mental and emotional damages) as they are subject to exposure of same sex interactions, and has allowed Buncombe County DSS to misjoin myself in their petition to terminate the respondent mother's parental rights in order to adopt my minor children out to the current temporary foster family. (Personal Interest In Foster Family) And has falsified information in their petition to terminate my parental rights. (I have copies of all said documents.)

I am indigent, incarcerated <for non related> and have no access to the Courts, Buncombe County Juvenile Court has forced court appointed attorney, <Joseph R. Horwitz> upon me, that has failed to notify me of court dates, orders, and procedures and refuses to send me copies to this date. I have filed a motion to dismiss counsel through the juvenile court to no avail. I have notified my counsel he has been relieved of his services, but he continues to act on my behalf.

I move this Court to enter an temporary injunction to stay all proceedings and procedures in Case/File No: 15JT 391, 392 and order the ^{Buncombe County} Court/Clerks Office for a complete certified copies of case file, index, and docket and certified transcripts from all court hearings in order to file a complete, thorough, and descriptive <formal> and itemized complaint showing specificity to each assertion and fact finder.

Wherefore I Ryan Allan Glidewell prays the Court for an order for temporary injunction to stay all proceedings, and procedures in case no. 15JT 391, 392 and an order for Court/Clerks Office to provide said documents, and for such other and further relief as the Court deems just and proper.

This the 8th day of November, 2016

Ryan Allan Glidewell
Ryan Allan Glidewell
Plaintiff/Petitioner

Certificate of Service

I certify I have placed a copy of the foregoing notice of action and request for temporary injunction in the U.S. mail with proper postage addressed affixed to the Honorable Dotson-Smith Judge for the Juvenile Court Division Case/File No.: 15JT391, 392 of Buncombe County address, Buncombe County Juvenile Court 60 Court Plaza Asheville, NC 28801.

This the 8th day of November, 2016

Ryan Allan Glidewell
Ryan Allan Glidewell
Plaintiff/Petitioner